

Exhibit E

**(October 9, 2017 Letter from Maier
Gutierrez & Associates to the Nissenbaum
Law Group)**

Exhibit E



October 9, 2017

VIA E-MAIL

Steven L. Procaccini, Esq.
2400 Morris Ave., Suite 301
Union, New Jersey 07083

RE: Todd Vandehey Gmail Account – tvandehey@gmail.com

This correspondence serves as a response to the inquiries within your letter dated October 5, 2017, regarding allegations of unauthorized access to Mr. Vandehey's Gmail and PayPal accounts as well as this firm's involvement with said allegations.

Your questions are a deliberate attempt to circumvent the Federal Rules of Civil Procedure. If you want to ask my client these questions, then you can either (1) serve him with interrogatories after we satisfy the meet & confer requirements of Rule 26(f), or (2) notice him for a deposition after we have met and conferred. Either way, your current approach is not only procedurally improper, but clumsy and self-serving, even if we adhere to an expedited discovery timeline.

It is also unclear under what law or authority you would be entitled to any response to your second question. I am indeed curious why you repeatedly ask questions which are not only blatant attempts to imply involvement in alleged tortious activities, but also necessitate a breach of attorney-client privilege with any answer that would be provided. Again, I will remind you to please adhere to the Federal Rules of Civil Procedure for proper discovery going forward.

Sincerely,

MAIER GUTIERREZ & ASSOCIATES

/s/ *Steven Knauss*

Joseph A. Gutierrez, Esq.
Steven G. Knauss, Esq.